

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

NORTH AMERICAN SUGAR INDUSTRIES INC.,

Plaintiff,

v.

Civil Action No.: 4:21-cv-00012

BBC CHARTERING USA, LLC,

Defendant.

PLAINTIFF'S CERTIFICATE OF INTERESTED PARTIES

Pursuant to the Court's Order issued on January 5, 2021, Dkt. No. 6, Plaintiff North American Sugar Industries Inc. ("American Sugar") hereby certifies that, to its knowledge, the following are persons, associations of persons, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of this litigation:¹

1. American Sugar, Plaintiff;
2. Cuban-American Mercantile Corporation, subsidiary of Plaintiff;
3. The West India Company, subsidiary of Plaintiff;
4. Azucar Holdings, LLC ("Azucar"), owner of Plaintiff;
5. Funds and entities affiliated with Apollo Global Management, Inc., part owners of Azucar;
6. Shell Oil Company, part owner of Azucar;

¹ Pursuant to the Court's Order, American Sugar has underlined any corporation whose securities are publicly traded, and has grouped individual parties as appropriate and provided a "general description" of each group. Dkt. No. 6.

7. Royal Dutch Shell plc, parent company of Shell Oil Company;
8. JPMorgan Chase Bank, N.A. (as Trustee for First Plaza Group Trust), part owner of Azucar;
9. JPMorgan Chase & Co., parent company of JPMorgan Chase Bank, N.A.;
10. Funds affiliated with The Goldman Sachs Group, Inc., part owners of Azucar;
11. Individual current and former members of Hexion LLC's management team, part owners of Azucar;
12. BBC Chartering USA, LLC, Defendant;
13. BBC Chartering & Logistic GmbH & Co. KG, parent company of Defendant; and
14. Briese Group, network of companies including Defendant.

American Sugar reserves the right to supplement this list if additional interested parties are identified.

Dated: January 20, 2021

Respectfully submitted,

Miguel A. Estrada (*pro hac vice*)
Audi K. Syarieff (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue NW
Washington, DC 20036-5306
Telephone: (202) 955-8257
Facsimile: (202) 530-9616
mestrada@gibsondunn.com
asyarieff@gibsondunn.com

Andrea E. Neuman (*pro hac vice*)
Rahim Moloo (*pro hac vice*)
Casey Kyung-Se Lee (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-3883
Facsimile: (212) 351-5303

/s/William B. Dawson
William B. Dawson
Texas Bar No. 05606300
S.D. Texas Bar No. 15924
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue
Suite 2100
Dallas, TX 75201-6912
Telephone: (214) 698-3131
Facsimile: (214) 571-2919
wdawson@gibsondunn.com

Attorney-in-Charge for Plaintiff North American Sugar Industries Inc.

aneuman@gibsondunn.com
rmoloo@gibsondunn.com
clee@gibsondunn.com

*Of Counsel for Plaintiff North American Sugar
Industries Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on January 20, 2021, a true and correct copy of the foregoing document was mailed via first-class mail, postage prepaid, to Defendant BBC Chartering USA, LLC at 6565 West Loop South, Suite 200, Bellaire, TX 77401, and also to its counsel, Naim Surgeon, at Akerman LLP, 350 East Las Olas Boulevard, Suite 1600, Ft. Lauderdale, FL 33301.

/s/ William B. Dawson
William B. Dawson